

Defense Exhibit 2

1 THE COURT: All right.

2 BY MR. COHEN:

3 Q Can you look at Page 3. That's Chapter 13.

4 It references threats to Mr. Patel, but it looks like
5 financial threats, not violent threats, correct?

6 A That's correct.

7 Mr. Patel said that early on -- well, there was also
8 physical threats. But early on the threat was if you don't
9 provide me additional money, then all of your money will be
10 lost.

11 Q Okay. The physical threats, were those put into the
12 Indictment?

13 A I --

14 Q That you're aware of.

15 A Not that I'm aware of.

16 [MR. COHEN: Okay.]

17 [I have no other questions, Your Honor.]

18 [THE COURT: Any redirect.]

19 [MS. RICHARDSON-JONES: No, No, Your Honor.]

20 [THE COURT: You can step down, Special Agent.]

21 [Any other witnesses for the Government?]

22 [MS. RICHARDSON-JONES: No, Your Honor.]

23 [THE COURT: Mr. Cohen.]

24 [MR. COHEN: I have two witnesses.]

25 [Our first one is Ann Marie, and her last name is]

1 A [REDACTED] Good morning.

2 Q Let me ask you, are you aware of an Allen Cox?

3 A [REDACTED] I am.

4 Q Okay. And are you aware that there was -- there was

5 [REDACTED] an agreement that Mr. Watson had drawn up to repay Allen

6 [REDACTED] Cox for the festival that -- from Southfork Ranch?

7 A [REDACTED] I was not aware of that until I saw it.

8 Q But you saw the repayment agreement that looks like

9 [REDACTED] he's trying to pay back the money, correct?

10 A [REDACTED] I did see that.

11 Q Okay. And are you aware of how many festivals

12 [REDACTED] Mr. Watson has put on in the past?

13 A [REDACTED] Put on --

14 Q Just in general.

15 A [REDACTED] Not exact number, no.

16 Q Are you aware of how many of these festivals were

17 [REDACTED] successful in the past?

18 A [REDACTED] No.

19 Q Okay. As far as -- and you read the Indictment out of

20 Texas, correct?

21 A I did.

22 Q And when you're talking about Mr. Patel and threats,

23 on page -- I don't know if you have the Indictment in front

24 of you. I can --

25 MR. COHEN: Can I give him my copy, Your Honor?